

FILED

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2/7/2024

**THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ANTONIO HAMMOND

CASE NUMBER: 24 CR 67
UNDER SEAL

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about October 22, 2023, at Chicago, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

Code Section

Title 18, United States Code, Section
1361

Offense Description

willfully injured property of or constructed for the
United States and the Federal Bureau of
Investigation, an agency thereof

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

Conor Stavoy

CONOR J. STAVOY

Inspector, Department of Homeland Security -
Federal Protective Service

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: February 7, 2024

Maria Valdez

MARIA VALDEZ

Judge's signature

City and state: Chicago, Illinois

MARIA VALDEZ, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, CONOR J. STAVOY, being duly sworn, state as follows:

1. I am an Inspector with the U.S. Department of Homeland Security - Federal Protective Service and have been so employed since approximately October 2022. Before my employment at Homeland Security, I was a Federal Agent with the National Nuclear Security Administration from April 2018 to October 2022. My current responsibilities at Homeland Security – Federal Protective Service include the investigation of alleged crimes committed against the United States including threats made against federal facilities, federal employees, and visitors and patrons of federal facilities. I am authorized to make arrests for crimes committed against the United States. Additionally, I routinely conduct investigations regarding damage to federal property.

2. This affidavit is submitted in support of a criminal complaint alleging that Antonio HAMMOND willfully injured or committed depredation against property of or constructed for the United States, in violation of Title 18, United States Code, Section 1361. Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging HAMMOND with willfully injuring property of the United States, I have not included each and every fact known to me concerning this investigation. I have set forth only

the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

3. This affidavit is based on my personal knowledge, my training and experience, information provided to me by other law enforcement agents, my review of video recordings, and information provided to me by other law enforcement agents and other individuals with knowledge of the events.

FACTS SUPPORTING PROBABLE CAUSE

4. In summary, and as set forth in more detail below, on or about October 22, 2023, HAMMOND went to the Federal Bureau of Investigation (“FBI”) office complex located at 2111 West Roosevelt Avenue, in Chicago, on two separate occasions. First, in the early evening hours of October 22, 2023, HAMMOND climbed a fence designed to prevent unauthorized access to the FBI and then climbed onto the roof of a building within the FBI office complex. On the second occasion, about three hours after his initial intrusion, HAMMOND returned to the FBI office complex, climbed a fence, forced open a ground-level door, and entered the FBI building, causing property damage to that door in the amount of approximately \$14,182 (including labor).

October 22, 2023: First Attempted Entrance At FBI

5. According to guard reports, surveillance footage, and Federal Protective Service MegaCenter (Dispatch) logs, at approximately 6:50 p.m., an individual—later identified as HAMMOND—arrived at the FBI office complex at 2111 West Roosevelt in Chicago, Illinois.

6. Based on my training and experience, and review of the lease agreement for this property, I know that this property is owned by a private entity and leased to the General Services Administration, an agency of the United States, and FBI, another agency of the United States. The property is occupied by FBI. Based on the lease agreement, the office complex at 2111 West Roosevelt was constructed specifically for FBI.¹

7. HAMMOND climbed over a fence surrounding the visitor parking lot of the office complex. HAMMOND then climbed onto the roof of a standalone building near the visitor parking lot. Based on my familiarity with this property, I know that there is a sign near the entryway of the FBI office complex that states "U.S. Government Property. Visitor Parking. For Official Business Only. No Photography Permitted."

¹ Title 18 United States Code Section 1361 applies to the destruction of federal property or "any property which has been or is being manufactured or constructed for the United States, or any department or agency thereof."

8. Below is an image from the surveillance video depicting HAMMOND on FBI property, near the perimeter of the office complex.²



9. I was notified over the phone by my dispatch (Battlecreek MegaCenter) of the presence of an intruder, and reported to the FBI office complex. When I arrived, HAMMOND was on the roof of the standalone building. I heard HAMMOND yell that the FBI owed him money, and that he was going to go into the FBI building and get his money.

10. Upon arriving at the FBI, I recognized HAMMOND's voice and appearance based on an interaction I had with him previously in my capacity as an Inspector with the Federal Protective Service. Specifically, on May 26, 2023, I

² My identification of HAMMOND is based on my face-to-face interactions with HAMMOND on October 22, 2023, during which HAMMOND responded to his first name, "Antonio," and my previous interactions with HAMMOND in my role as an Inspector with Federal Protection Services. In addition, I compared the individual depicted in the October 22, 2023 surveillance video with a photograph of HAMMOND maintained by the Illinois Secretary of State and determined they were the same person.

responded to a disturbance at the JCK Federal Building located at 230 S. Dearborn, Chicago, Illinois. HAMMOND was present and was issued a federal citation for causing a disturbance at the building.

11. I spoke to HAMMOND while he was on the roof of the standalone building, and he responded to his first name, "Antonio." I continued to speak with HAMMOND, and he ultimately came down from the roof voluntarily.

12. Chicago Fire Department personnel transported HAMMOND to University of Illinois Chicago Hospital for a mental health evaluation. I rode in the back of the ambulance with HAMMOND to the hospital.

13. Around this point, I warned HAMMOND not to return to the FBI building unless he had an appointment with an agent. Once HAMMOND was under the care of medical professionals, I left the hospital.

October 22, 2023: Second, Forcible, Entrance At FBI

14. According to surveillance footage, my discussions with on-site security guards, and communications on my department-issued radio, on October 22, 2023, at about 9:51 p.m., HAMMOND returned to the FBI office complex at 2111 West Roosevelt in Chicago, Illinois.

15. As depicted in surveillance footage, HAMMOND climbed over a fence closing off the FBI office complex. Once on FBI property, HAMMOND climbed over an additional interior fence and approached a locked entrance door leading to the building. As depicted in the surveillance footage, HAMMOND is wearing an orange

hat, dark-colored jacket, and jeans, which appear to be the same clothing items he wore during the earlier incident on October 22, 2023.

16. According to surveillance video, HAMMOND began to pull on the locked doors leading to the interior of the FBI building in an attempt to open them. The surveillance video shows that the force HAMMOND used while trying to open the door caused the glass façade on that part of the building to rattle. According to responding security officers, they warned HAMMOND to stop pulling on the doors for which he replied, “Fuck the police.” HAMMOND continued to try to force the door open.

17. Based on surveillance footage, HAMMOND forced the door to open, and he entered the FBI building. Based on a subsequent examination of the door by FBI Security, facility property management, and contractor technicians, the force HAMMOND used against the door permanently damaged the door’s locking mechanism.

18. Once HAMMOND was through the glass entrance door he was confronted with an interior door. HAMMOND pushed his way through the door to gain access to FBI’s interior space.

19. Based on information from the FBI internal operations center, once inside, HAMMOND picked up a telephone, pressed 0, and was connected to the FBI Chicago internal operations center where he demanded to speak to an FBI agent.

20. Inside the building, HAMMOND was apprehended and detained by responding Chicago Police Department officers. After he was detained, I observed

HAMMOND inside of the FBI building. Based on my prior interactions with HAMMOND—including earlier that evening—I recognized his voice and overall appearance. Lastly, HAMMOND continued to respond to his first name of “Antonio” when I addressed him.

Resulting Property Damage To FBI Property

21. Based on my discussions with the facilities manager at FBI and my review of invoices from the building contractor technicians, HAMMOND’s forcible entry to the FBI office building damaged the door through which he forced entry. Specifically, the force HAMMOND exerted against the door damaged the complex latching mechanisms on the door. The door’s latching and rod system therefore had to be removed and replaced. Based on invoices from the contractor who performed the repairs, the repair to the door’s latching system cost approximately \$14,182. This approximate total consists of approximately \$4,484 in replacement parts and assembly, and the remaining amounts in labor and other fees.

CONCLUSION

22. Based on the information set forth above, there is probable cause to believe that, on October 22, 2023, HAMMOND willfully injured or committed depredation against property of or constructed for the United States, and the damage to that property exceeded \$1,000, in violation of Title 18, United States Code, Section 1361.

FURTHER AFFIANT SAYETH NOT.

Conor Stavoy
CONOR J. STAVOY
Inspector
U.S. Department of Homeland Security -
Federal Protective Service

SWORN TO AND AFFIRMED by telephone February 7, 2024.

Maria Valdez
Honorable MARIA VALDEZ
United States Magistrate Judge